



The New York Times
Company

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VIA ECF

The Honorable Vernon S. Broderick
United States District Judge
Southern District of New York
United States District Courthouse
500 Pearl Street
New York, New York 10007

Re: *In re: The New York Times Company, 24-mc-45*

Dear Judge Broderick:

I am counsel to The New York Times Company (“The Times”) in the above-referenced matter. The Times writes to respectfully propose a schedule for further proceedings in this matter. The Government takes no position on The Times’s proposal.

As Your Honor will recall, this case stems from the wholesale sealing of the docket in the criminal case of Christopher Wade. In 2020, former President Donald Trump granted “a full and unconditional pardon” to Mr. Wade “[f]or his conviction in the United States District Court for the Southern District of New York in sealed Docket No. 06-cr-594; the offenses of conviction and sentence are also under seal.”¹

In January 2024, The Times moved to unseal the judicial records in *Wade*, including the docket itself. On March 11, the Government made

¹ Press Release, White House, Statement from the Press Secretary Regarding Executive Grants of Clemency (Dec. 23, 2020), <https://bit.ly/3UhyUY9>.

a sealed, ex parte submission to Chambers with its position on The Times's motion. On March 15, The Times moved to have that submission unsealed. *See* ECF No. 7. On April 18, the Government filed a redacted version of its March 11 position letter, along with a submission justifying the redactions. Importantly, as part of its submissions, the Government stated that “most of the judicial records in the Wade matter [should] be unsealed, in particular: (1) the docket, except for certain docket entries; and (2) certain core judicial records, specifically the criminal complaint, the information, and the judgment of conviction.” *See* ECF No. 9.

The Times requests that the Court proceed to unseal those records identified by the Government as disclosable. We further propose that The Times be given 10 days after the documents are unsealed to inform the Court if it believes additional motion practice is required and to propose a briefing schedule at that time.

We thank the Court for its consideration of this matter.

Respectfully submitted,

David McCraw

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